

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

v.

DOMINGO ANGEL TOLENTINO-
FERNANDEZ, (01),
[DOB: 08/02/1993]

and

JAIME TORREZ-RAMIREZ, (02),
[DOB: 03/18/1986]

Defendants.

Case No.: 21-00061-01/02-CR-W-RK

COUNT ONE:

Conspiracy to Distribute a Controlled Substance

21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846

NLT: 10 Years' Imprisonment

NMT: Life Imprisonment

NMT: \$10,000,000 Fine

NLT: 5 Years' Supervised Release

Class A Felony

COUNT TWO:

Possession With Intent to Distribute a Controlled Substance

21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

NLT: 10 Years' Imprisonment

NMT: Life Imprisonment

NMT: \$10,000,000 Fine

NLT: 5 Years' Supervised Release

Class A Felony

\$100 Mandatory Special Assessment for each Count of Conviction

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about February 16, 2021, and February 17, 2021, in the Western District of Missouri and elsewhere, the defendants, DOMINGO ANGEL TOLENTINO-FERNANDEZ and JAIME TORREZ-RAMIREZ, did knowingly and intentionally combine, conspire and confederate with each other and others, both known and unknown, to distribute 500 grams or more of a mixture

or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance and 1 kilogram or more of a mixture or substance containing heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and 846.

COUNT TWO

On or about February 17, 2021, in the Western District of Missouri, the defendants, DOMINGO ANGEL TOLENTINO-FERNANDEZ and JAIME TORREZ-RAMIREZ, aiding and abetting each other, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance and 1 kilogram or more of a mixture or substance containing heroin, a Schedule I controlled substance

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

A TRUE BILL.

3/17/2021

DATE



Robert M. Smith
Assistant United States Attorney
Violent Crime & Drug Trafficking Unit
Western District of Missouri



FOREPERSON OF THE GRAND JURY